

March 28, 2025

*Via ECF*

The Honorable Arun Subramanian  
United States District Judge  
500 Pearl Street  
New York, NY 10007

Re: *United States et al. v. Live Nation Entertainment, Inc., et al.*, 24-CV-3973 (AS)  
Unsealing Motion to Compel and Exhibits, ECF 480 and 480-1 to 480-7

Dear Judge Subramanian:

Plaintiffs seek the Court's leave to publicly file an unredacted version of the Motion to Compel and Exhibits, which are currently filed under seal at ECF 480 and ECF 480-1 to 480-7. The Court's deadline for Defendants to seek continued redaction of these materials has passed, and therefore Plaintiffs respectfully submit that there is no longer any valid basis to maintain the redacted Motion to Compel and redacted and withheld Exhibits under seal.

On March 11, 2025, Plaintiffs sought leave to file their Motion to Compel and Exhibits with redactions and under seal—and to provisionally file an unredacted version of the Motion to Compel and Exhibits under seal—because they contained information that Defendants had requested to redact. ECF 478. Pursuant to the Court's Individual Practices ¶11(C)(i), Plaintiffs requested that Defendants be required to file a letter-motion to seal within three business days “explaining the need to seal or redact the document.” Today is the thirteenth business day since that filing, but Defendants have not submitted an explanation of any basis for continued sealing of the Motion to Compel and Exhibits. Indeed, Defendants' letter responding to the Motion to Compel publicly reveals sealed information about the pre-Complaint investigation and cites to Exhibits filed under seal. *See* ECF 482 (citing sealed ECF 480-3 and 480-4, and detailing when the United States issued its Civil Investigative Demand to Defendants).

The Motion to Compel and Exhibits also referenced documents or information designated by a third party as Highly Confidential. *See* ECF 478. The third party does not take a position on Plaintiffs' request to file the Motion to Compel and Exhibits publicly without redactions.

Given Defendants' lack of response to the Motion to Seal and the third party not moving to extend the sealing, there is no need for ongoing sealing or redaction of the Motion to Compel and Exhibits and no basis to override the presumption of public access. *See, e.g., Sines v. Yiannopoulos*, 2020 WL 6058279, at \*7 (S.D.N.Y. Oct. 14, 2020) (granting request to unseal “[i]n the interest of transparency and in furtherance of the ‘presumption of access’” where the “Respondent did not respond”). Therefore, Plaintiffs respectfully request leave to file the Motion to Compel and Exhibits publicly without redactions.

Respectfully submitted,

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